



F K Webb  
Manager

DIVISION FILE

MADISON CO. 11911501

Amoco Oil Company

Wood River Refinery  
Post Office Box 182  
Wood River, Illinois 62095

Manufacturing Department  
618-251-2200

WOOD RIVER / AMOCO

July 22, 1981

Mr. Kenneth G. Mensing  
Southern Regional Manager  
Illinois Environmental Protection Agency  
Land Field Operations Section  
Division of Land/Noise Pollution Control  
113 West Main Street  
Collinsville, Illinois 62234

RECEIVED

JUL 27 1981

E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Dear Ken:

Attached is a copy of a letter dated July 17, 1981 from Ms. Sandra S. Gardebring, of Region V USEPA, to Bob McDaniel with copy listed to Mike Hayes, Acting Manager, Division of Land/Noise Pollution Control IEPA. This is the long-sought delisting of our riverfront lagooned waste derived primarily from DAF float.

As discussed by phone, we want to secure an IEPA permit to haul this special waste to St. Louis Metropolitan Sanitary District's Lemay and/or Bissell Point plants for incineration with their sewer sludge. This is environmentally sound disposition of our sludge; and, with some oil content, it reduces MSD's usage of natural gas in their incinerator.

The USEPA delisting was necessary because MSD's charter does not permit them to accept "Hazardous Wastes." I talked to Phil Kaplan (Region V) right after our phone conversation this morning and he confirmed that no USEPA manifests or RCRA numbers are necessary. This is now to be handled as a special waste under IEPA manifests.

Ken, the quantities of this material to be hauled are large. We have at least 18,000,000 gallons of settled sludge and are likely to get some additional water entrained in handling. Initially we will be hauling 3 to 6 loads per day to MSD's Lemay plant. Later, after mechanical handling details are worked out, we may also haul 5 to 10 loads per day to the MSD Bissell Point plant. We will weigh each load on our plant scale for our records, but if possible would like to use only one daily manifest sheet to record the amount hauled to each MSD plant.

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ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

EPA Region 5 Records Ctr.



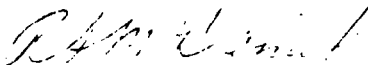
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We have not yet contracted for the hauling. With the quantity involved, we want to get competitive bids. It will be hauled in tank trucks, with tight valves.

I will appreciate your advice and help in expediting a permit for hauling this special waste to Missouri. Of course, we will be discussing this with the Missouri DNR to resolve any problems from their end.

Yours truly,



R. S. McDaniel  
Manager, Environmental &  
Quality Control

RSM/de

Attachment

R. J. Baechle  
C. M. Hamilton  
J. S. Moore

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JUL 27 1981

E.P.A. — D.L.P.C.  
STATE OF ILLINOIS



17 JUL 1981

Bob McDaniel, Manager  
Environmental Quality and Control  
Amoco Oil Company  
Box 182  
Wood River, Illinois 62095

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

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JUL 20 '81			
E & QC			
	INFO	HNDL	FILE
GRR			
EJS			5EWM
DDK			
CAB			
RSM			

REPLY TO ATTENTION OF:

Dear Mr. McDaniel:

This is in response to your telephone conversation with Phil Kaplan of my staff on July 1, 1981, regarding the delisting of hazardous waste found at your Wood River, Illinois facility. The Enforcement Division is in receipt of a memorandum dated June 23, 1981, from Douglas B. Farnsworth, Chief, Regulatory Branch, Legal Division, Office of Hazardous Waste Enforcement, United States Environmental Protection Agency (U.S. EPA). The memorandum indicates that the U.S. EPA has made a preliminary determination to publish in the Federal Register notice to exclude certain wastes generated at particular facilities from the lists in 40 CFR 261, Subpart D. These wastes are to be excluded or delisted pursuant to 40 CFR 260.20 and 260.22. The determination includes a waste generated at the Amoco Oil Company Wood River facility (EPA ID No. ILD006272629) which has an EPA Waste No. K048, dissolved air flotation (DAF) float from the petroleum refining industry. The memorandum notes the following condition:

"Temporary exclusion to involve the 18 million gallons of sludge presently in on-site lagoons; waste to be incinerated at Metropolitan St. Louis Sewer District's Lemay and/or Bissel waste treatment plants. Mixture percentages to be determined by State Implementation Plan (SIP) ambient air levels for lead. Alternative land disposal scenario of dewatered sludge to be verified by EP-II methodology before initiation."

Until the delisting of the above waste becomes effective upon publication in the Federal Register, the U.S. EPA will refrain from taking enforcement action under the Resource Conservation and Recovery Act (RCRA), Subtitle C, 42 USC 6901 et seq. and 40 CFR Parts 262 and 265 relating to the handling on such waste. Should you have any questions regarding this matter, please call Phil Kaplan at (312) 353-2114.

Very truly yours,

*Sandra Gardebring*  
Sandra S. Gardebring  
Director, Enforcement Division

cc: Mike Hayes, Acting Manager  
Division of Land/Noise Pollution Control  
Illinois Environmental Protection Agency

Mark D. Ryckman, Vice President  
Engineering Operations  
Ryckman's Emergency Action and  
Consulting Team

RECEIVED

JUL 27 1981

E.P.A. — D.L.P.C.  
STATE OF ILLINOIS

cc JCH ✓  
EJS  
JSM  
CAB  
RAS